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CHALLENGE, INC.

March 25, 1998

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Alva E. Smith, Esq.  
Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463

Re: MUR 4728 -- Designation of Counsel;  
Request for Extension of Time to Respond

Dear Ms. Smith:

Attached is a Statement of Designation of Counsel for our client Campaign for Working Families in Matter Under Review 4728. Counsel is not designated for Gary L. Bauer, because as we understand the documents received from the Commission, Mr. Bauer is not a respondent. The complaint appears to allege a failure timely to report an independent expenditure or, in the alternative, an excessive in-kind contribution by the Campaign for Working Families. Mr. Bauer simply authored the letter in his capacity as an officer of a political committee. The conduct complained of, under either alternative pleading, is the cost of this letter, which was born entirely by the political committee. Indeed, the complainant's cover letter of March 12, 1998, states: "Please consider the enclosed as a Complaint against these Political Committees." Please confirm in writing the Commission's concurrence that Mr. Bauer is not a respondent in MUR 4728.

In addition, Campaign for Working Families requests an extension of thirty (30) days' time to respond to the complaint. The additional time is needed to review documents regarding the events in question and to interview the persons responsible for filing reports on behalf of the Campaign for Working Families.

Please do not hesitate to contact me or Bobby Burchfield (202-662-5143) should you have any questions concerning this matter.

Sincerely,

*Charles D. Haley*

Charles D. Haley

Enclosures

cc: Bobby R. Burchfield, Esq.

## STATEMENT OF DESIGNATION OF COUNSEL

MUR 4728NAME OF COUNSEL: Bobby R. Burchfield, Charles D. HaleyFIRM: Covington & BurlingADDRESS: 1201 Pennsylvania Avenue, N.W.Washington, D.C. 20004TELEPHONE: 202 662-5350 (Burchfield)  
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FAX: (202) 778-5143 (Haley)

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

3/25/98  
Date  
SignatureRESPONDENT'S NAME: Campaign for Working FamiliesADDRESS: Campaign for Working Families499 South Capitol Street, S.W., Suite 410Washington, D.C. 20003TELEPHONE: HOME( ) N/ABUSINESS( 202 ) 479-9696